



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

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**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME: JAMES GALE**

**MOS TAX: 943265**

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

MOS IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTION:  
JONAS BONNEAU v. CITY OF NEW YORK ET AL, CV 12 4663, FILED IN THE US  
EASTERN DISTRICT OF NEW YORK;

**Disclosure #2:**

NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION DATED 6/29/18:  
ALLEGATION: INVOICE DISCREPANCY - LAB – CONTROLLED SUBSTANCE  
CLOSED DATE : 2018-09-07  
ACTION TAKEN : TRAINING

**Disclosure #3:**

NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION DATED 9/11/18:  
ALLEGATION: INVOICE DISCREPANCY - LAB - CONTROLLED SUBSTANCE  
CLOSED DATE : 2018-10-31  
ACTION TAKEN : COMMAND DISCIPLINE

Eric Gonzalez  
District Attorney  
Kings County